

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JOHN O'MARA, et al.,)	
)	
Plaintiffs,)	
v.)	Case No. 4:21-cv-00401-DDN
)	
BREAKTHROUGH PLUMBING CO., LLC,)	
)	
Defendant.)	

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

COME NOW plaintiffs and defendant and stipulate to the entry of judgment on the following terms:

1. Judgment shall be entered in favor of plaintiffs and against defendant in the amount of \$183,155.28, consisting of \$137,192.37 in contributions, \$27,438.47 in liquidated damages, \$7,811.11 in interest, and \$10,713.33 in dues for the period of May through October 2020.

2. Defendant shall pay plaintiffs \$155,716.81 as follows. Defendant shall make the following payments on the first day of each month in the form of a cashier's check: (1) \$1,500.00 per month during the period of December 1, 2021 through March 1, 2022, (2) \$3,000.00 per month during the period of April 1, 2022 through July 1, 2022, (3) and \$6,000 per month beginning August 1, 2022 until \$155,716.81 is paid in full.

3. Plaintiffs shall make no attempt to collect the amounts identified in paragraph (1) so long as the payment plan described in paragraph (2) is being complied with and defendant abides by the terms of the parties' Settlement Agreement. To the extent that the payment plan provided in paragraph (2) is not complied with and/or defendant breaches the parties' Settlement Agreement and fails to timely cure the breach, the entire balance of the amounts identified in paragraph (1) will become immediately due and plaintiffs may pursue collection efforts.

4. This Stipulation for Entry of Consent Judgment will not be filed with the Court unless defendant fails to comply with its terms.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

Respectfully submitted,

SWANSON, MARTIN & BELL, LLP

HARTNETT REYES-JONES, LLC

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Attorneys for Plaintiffs

BREAKTHROUGH PLUMBING CO., LLC

By: 

Its: 

SO ORDERED:

UNITED STATES DISTRICT JUDGE

Date: _____